

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Michael Benjamin Bode
Katie Ann Bode
Debtor(s)

Chapter 13

Case No. 23-11121-PMM

Matter: Motion to Pay

DEBTOR(S)' AMENDED MOTION TO PAY

AND NOW, come the Debtor(s), Michael Benjamin Bode and Katie Ann Bode, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Amended Motion to Pay and aver as follows:

- 1) Debtor(s) filed a Chapter 13 Petition on or about April 18, 2023.
- 2) Debtor, Michael Benjamin Bode, receives regular income from employment with **Kinsey's Archery Products**, which may be attached under 11 U.S.C. §1326 to fund Debtor(s)' Chapter 13 Plan. Debtor(s) have proposed a Plan under which a portion of future earnings or wages is to be paid to the Standing Chapter 13 Trustee, for the benefit of creditors, in the amount of **\$92.31** from each **bi-weekly** paycheck.
- 3) The likelihood of success in this case will be much greater if Debtor's income is attached to fund the Plan, and Debtor consents to the wage attachment.
- 5) Debtor's employer should be ordered to deduct from Debtor's future earnings or wages the periodic amount proposed by the Plan filed herein, and to pay said amount forthwith to the Standing Chapter 13 Trustee appointed by the Court and continue such periodic deductions and payments until such time as the Plan submitted by Debtor is consummated, or until further order of the Court.

WHEREFORE, the Debtor(s) respectfully requests that this Court enter an Order directing the above-mentioned employer to pay the Standing Chapter 13 Trustee in the amount set forth in the attached Order.

Respectfully submitted,

Date: June 30, 2023

/s/ Michael Benjamin Bode

Debtor

DETHLEFS PYKOSH & MURPHY

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

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ORDER OF COURT

UPON CONSIDERATION of the above-referenced Debtor(s) having filed a Plan under Chapter 13 of the Bankruptcy Code and having submitted all future income to the jurisdiction of this Court in accordance with statute, IT IS HEREBY ORDERED that until further Order of this Court, the entity from whom Debtor, Michael Benjamin Bode, receives income from:

Kinsey's Archery Products
Attn: Payroll Department
1660 Steel Way Drive
Mount Joy, PA 17552

Should deduct from said Debtor 1's income the sum of **\$92.31** from each **Bi-weekly** paycheck, or such other sums as Debtor may from time to time direct, beginning on the next pay day following receipt of this Order and deduct a similar amount each pay period thereafter, including any period from which Debtor receives a periodic or lump sum payment as a result of vacation, termination, or any benefits payable to Debtor, and to remit the deductible sums to:

Scott F. Waterman, Esquire
Standing Chapter 13 Trustee
PO Box 680
Memphis, TN 38101

IT IS FURTHER ORDERED that the entity from whom Debtor receives income shall notify the Standing Chapter 13 Trustee if Debtor's income is terminated and the reason, therefore. IT IS FURTHER ORDERED that all remaining income of Debtor except the amounts required to be withheld for taxes, social security, insurance, pension, or union dues be paid to said Debtor in accordance with usual payment procedure. IT IS FURTHER ORDERED that the employer will place the Bankruptcy Case Number and the name of the Debtor(s) on all checks being forwarded to the Standing Chapter 13 Trustee to ensure proper accounting of the funds.

Date:

Patricia M. Mayer, Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

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CERTIFICATE OF SERVICE

I hereby certify that on Friday, June 30, 2023, I served a true and correct copy of the **Debtor(s)' Amended Motion to Pay**
and proposed Order in this proceeding upon the following:

Via USPS First Class Mail
Kinsey's Archery Products
Attn: Payroll Department
1660 Steel Way Drive
Mount Joy, PA 17552

Via Electronic Means
Scott F. Waterman, Esquire
Standing Chapter 13 Trustee
2901 Saint Lawrence Avenue
PO Box 4010
Reading, PA 19606

Office of the United States Trustee
Robert NC Nix, Sr. Federal Building
900 Market Street, Suite 320
Philadelphia, PA 19107

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire